



BOULT • CUMMINGS  
CONNERS • BERRY PLC

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September 27, 2001  
EXECUTIVE SECRETARY

David Waddell  
Executive Secretary  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37243

Re: *Docket to Determine the Compliance of BellSouth Telecommunications Inc.'s  
Operations Support Systems with State and Federal Regulations*  
Docket No: 01-00362

Dear David:

Attached is AT&T Communications of the South Central States, Inc., TCG MidSouth, Inc., and the Southeastern Competitive Carriers Association List of Persons to be Deposed and Request for Additional Time for Depositions.

Very truly yours,

BOULT, CUMMINGS, CONNERS & BERRY,

HW/cw

By:

Henry Walker

**BEFORE THE  
TENNESSEE REGULATORY AUTHORITY  
Nashville, Tennessee**

In re:	)	
Docket to Determine the	)	
Compliance of BellSouth	)	
Telecommunications, Inc.'s	)	Docket No.: 01-00362
Operational Support Systems with	)	
State and Federal Regulations	)	

**AT&T COMMUNICATIONS OF THE SOUTHCENTRAL STATES, INC., TCG  
MIDSOUTH, INC.'S, AND THE SOUTHEASTERN COMPETITIVE CARRIERS  
ASSOCIATION'S, LIST OF PERSONS TO BE DEPOSED AND REQUEST FOR  
ADDITIONAL TIME FOR DEPOSITIONS**

AT&T Communications of the South Central States, Inc. and TCG MidSouth, Inc. (collectively "AT&T") and the Southeastern Competitive Carriers Association ("SECCA") hereby files its List of Persons to be Deposed pursuant to the Tennessee Regulatory Authority's (the "Authority") *Order Establishing Issues and Procedural Schedule* of September 13, 2001.<sup>1</sup> Additionally, AT&T and SECCA request that the Authority allot additional time for the depositions given the number that need to be taken. AT&T and SECCA's list of persons to be deposed is as follows:

**BELLSOUTH TELECOMMUNICATIONS, INC.**

1. Mark Butterworth
2. Fay Dodgen
3. Melaine Hardwick
4. Al Heartley

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<sup>1</sup> Based on current knowledge AT&T and SECCA list the persons to be deposed. However, as discovery responses are provided and depositions are taken, the list may be modified slightly based on new knowledge.

5. Dan King
6. Doug McDougal
7. Milton McElroy
8. Ron Pate
9. Phil Porter
10. William Stacy
11. Al Varner
12. Victor Wakeling
13. Ken Ainsworth
14. James Saville
15. Kathy Wilson-Chu
16. Pam Napier

### **KPMG CONSULTING, INC. ("KPMG")**

#### **General Test Management & Pre-Ordering, Ordering, & Provisioning**

1. Nicole Giugno
2. Adina Brownstein

#### **Metrics & Flow-Through Evaluation**

3. Larry Freundlich (KPMG, LLP)
4. Steve Strickland

#### **Billing**

6. Liz Fuccillo

#### **Change Management**

7. Brian Rutter

#### **RSIMMS and Encore Systems Review & Systems Capacity Management**

8. Sudhir Ullal
9. Mike Weeks
10. Walton Smith

#### **Statistics/Sample Sizes**

11. Alan Salzburg
12. Person most knowledgeable about setting the sample sizes for the Georgia Third Party Test

#### **Florida Third Party Test**

13. Dave Wirsching
14. Graham Watkins (Change management)
15. Bill Wahl (Test environment)
16. Linda Gray (Metrics)

17. Mary Beth Keane (Ordering)
18. John Cacopardo (Billing)
19. John Gena (Billing)

#### **PRICEWATERHOUSE COOPERS, LLP ("PWC")**

1. Roger Lattimore
2. Ron Taylor
3. Martino Stefanoni

(AT&T and SECCA anticipate that additional names for PWC depositions will be provided through the deposition of Roger Lattimore in North Carolina on October 5, 2001 and through discovery served on KPMG in this Docket with responses due on October 12, 2001. Therefore, AT&T reserves the right to name additional deponents for PWC.)

#### **HEWLETT PACKARD COMPANY ("HP")**

1. Parag Doshi (Volume Testing)
2. Whit Matteson
3. Person most knowledgeable about HP's role as third party tester in the Georgia third party test and is most knowledgeable about HP's relationship with BellSouth during the time HP was acting as the third party tester in Georgia.
4. Person most knowledgeable about the building of interfaces during the Georgia third party test and the working relationship with BellSouth to build hose interfaces.

#### **CAP GEMINI (formerly known as Ernst and Young)**

Person most knowledgeable about:

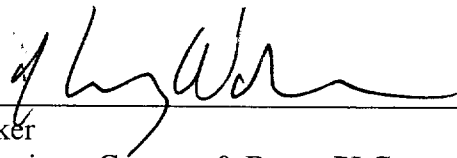
1. overall test design
2. working with BellSouth to draft the following parts of the Georgia third party test plan:
  - a. General Test Management & Pre-Ordering, Ordering, & Provisioning
  - b. Metrics & Flow-Through Evaluation
  - c. Billing
  - d. Change Management
  - e. Systems Capacity Management
  - f. Maintenance & Repair

Pursuant to the Authority's Order of September 13, 2001, the Authority scheduled the depositions in this docket to be taken during the week of October 29 – November 2,

2001, unless the parties and the Authority agree otherwise. As raised before the Authority on September 6, 2001, the North Carolina Utilities Commission is conducting its hearing on BellSouth's Section 271 application during the week of October 29. Thus, as the Authority has allowed, the parties will likely need to schedule other deposition times with the input of the Authority's staff. AT&T and SECCA simply request, given the numerous depositions to be taken, that the Authority grant more than a week of time for the taking of those depositions.

Respectfully submitted,

By: \_\_\_\_\_



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Boulton, Cummings, Connors & Berry, PLC  
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(615) 252-2363  
Counsel for Southeastern Competitive Carriers  
Association, Inc.

By: \_\_\_\_\_



Sylvia E. Anderson  
AT&T Communication of the South Central States  
TCG MidSouth, Inc.  
1200 Peachtree Street, N.E.  
Suite 8100  
Atlanta, GA 30309

## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been forwarded via U.S. Mail, postage prepaid, to the following on this the 27<sup>th</sup> day of September 2001.

Guy Hicks, Esq.  
BellSouth Telecommunications, Inc.  
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AT&T Communications of the South  
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1200 Peachtree St., NE Suite 4068  
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Timothy Phillips, Esq.  
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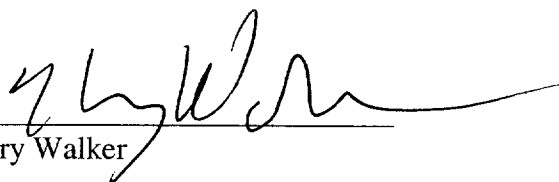
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CT Corporation System  
530 Gay Street  
Knoxville, TN 37902

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Lexis Document Services, Inc.  
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Mr. Jesse Fenner  
KPMG  
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William B. Hill, Jr., Esq.  
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